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District Judge Tana Lin

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

KATYE HURLBUT and DUSTIN HURLBUT,
and the marital community comprised thereof,

Plaintiffs,

v.

UNITED STATES; MADIGAN ARMY
MEDICAL CENTER, a governmental entity;
JANE and JOHN DOES 1-10, in their
respective individual capacities,

Defendants.

CASE NO. 3:22-cv-05819-TL

**STIPULATED MOTION &
ORDER FOR 60-DAY
EXTENSION FOR DEFENDANTS
TO RESPOND TO PLAINTIFFS'
COMPLAINT**

NOTE ON MOTION CALENDAR:

DECEMBER 19, 2022

The parties, Katye Hurlbut and Dustin Hurlbut, by and through Thomas B. Vertetis, Elizabeth P. Calora, and William T. McClure of the Pfau, Cochran, Vertetis & Amala firm and Eric Fong of Fong Law, and the United States, by and through Vanessa R. Waldref, United States Attorney for the Eastern District of Washington, and Joseph P. Derrig and Derek T. Taylor, Assistant United States Attorneys for the Eastern District of Washington and Special Attorneys Acting Under Authority Conferred by 28 U.S.C. § 515, have conferred and hereby move pursuant to LCR 7(d)(1) and 10(g) for an agreed/stipulated extension until March 3, 2023 for Defendant United States to respond to Plaintiffs' Complaint.

The requested extension is due to the parties having arranged mediation on February 28, 2023, before mediator Roy Umlauf. Allowing mediation to be accomplished before the parties

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RESPOND TO PLAINTIFF'S COMPLAINT - 1

engage in responsive pleading will conserve both the parties and the Court's resources, without prejudice to any party. Accordingly, good cause exists for this extension.

RESPECTFULLY SUBMITTED: December 12, 2022.

Vanessa R. Waldref
United States Attorney for EDWA

PFAU, COCHRAN, VERTETIS & AMALA,
PLLC

s/ Joseph P. Derrig
s/ Derek T. Taylor

s/ Thomas B. Vertetis
s/ Elizabeth P. Calora
s/ William T. McClure

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Attorneys for Plaintiffs

The parties having stipulated and agreed, it is so ORDERED.

DATED this 19th day of December, 2022.



Tana Lin
United States District Judge

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TO RESPOND TO PLAINTIFF'S
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